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June 2, 2025

VIA ECF

Hon. Andrew E. Krause, U.S.M.J.
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

**Re: *Project Veritas et al. v. O'Keefe et al.*, No. 23-CV-04533-CS-AEK
(S.D.N.Y.)**

Dear Judge Krause:

I write on behalf of Counterclaim-Defendants Project Veritas and Project Veritas Action Fund (collectively, "PV"), in accordance with the Court's May 29, 2025 Order requiring PV to submit a letter "regarding whether any of the alleged conduct discussed in the letter at ECF No. 161 violates the Protective Order." (*See* Dkt. 163 at 1-2).

At this time, PV does not believe that any of the conduct discussed in the letter at ECF No. 161 violates the Protective Order. PV notes, however, that different versions of similar videos containing different excerpts of depositions have been made publicly available in different locations on the Internet. PV cannot be sure that it has located all such versions. Moreover, PV has not received a copy of the full-length video located on Counter-Claim Plaintiffs' website, which is only otherwise available for a fee payable to Counter-Claim Plaintiffs. PV thus cannot be sure at this time that there has been no violation of the Protective Order, and reserves the right to raise the issue in the event that it becomes apparent that a violation has occurred.

Finally, PV notes that, although the conduct discussed in the letter at ECF No. 161 does not appear to violate the Protective Order, PV anticipates presenting certain confidential information at the upcoming June 9, 2025 status conference. Accordingly, PV anticipates requesting that portions of the status conference discussing such confidential information be sealed from the public.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael J. Harris", written in a cursive style.

Michael J. Harris